



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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TRIBAL AND PUBLIC
AFFAIRS

August 13, 2013

Deborah Holman, Project Administrative Coordinator
Gravina Access Project SEIS
DOT&PF Southeast Region
P.O. Box 112506
Juneau, Alaska 99811-2506

Re: EPA comments on the Gravina Access Project Draft Supplemental Environmental Impact Statement, EPA Project #08-047-FHW.

Dear Ms. Holman:

Thank you for the opportunity to review the Draft Supplemental Environmental Impact Statement for the Gravina Access Project in Ketchikan, Alaska (CEQ #20130184). We have reviewed the EIS in accordance with our responsibilities under Section 309 of the Clean Air Act and the National Environmental Policy Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions as well as the adequacy of the EIS in meeting procedural and public disclosure requirements of NEPA. We are also fulfilling our responsibility as a participating agency under Moving Ahead for Progress in the 21st Century Act.

We appreciate the effort of the FHWA and ADOT to re-evaluate a full range of alternatives in order to address both the cost concerns previously identified in the original NEPA process as well as new information identified since the previous EIS. We also appreciate the effort to produce a reader-friendly and succinct document that clearly articulates the anticipated impacts of the proposed project. We believe that the visual graphics, maps, and impact summary tables are very useful to the reader.

The Draft SEIS examines two bridge alternatives at separate locations (one that crosses Tongass Narrows near the airport (Alternative C3-4), and one that crosses Pennock Island (Alternative F3)), and four ferry alternatives (three ferry alternatives that would supplement the existing airport ferry service with new ferries and terminals (Alternatives G-2, G-3, and G-4), and Alternative G4-v-ferry alternative that makes improvements to the existing airport ferry facilities). Although no preferred alternative is identified in the SEIS, we have assigned the document an overall rating of EC-2 (Environmental Concerns-Insufficient Information). A description of our rating system is enclosed. In addition, we have rated each alternative based on the alternative's potential impacts in the table below:

Alternative	Rating	Justification
No Action	LO	Although higher life costs, reduced customer convenience, and lower health and safety capability, no additional environmental impacts beyond current impacts
Alt C3-4 Airport Bridge	EC	Most user access and convenience but higher impacts to

		wetlands and highest impacts to private property, airspace intrusion, highest number of piers
Alt F3 Pennock Island bridge	EC	Most access but highest impacts to wetlands and private property, highest number of stream crossings, essential fish habitat loss, highest amount of dredging required, most induced growth
Alt G2 Peninsula Point to Lewis Point ferry	EC	Second highest permanent impacts to wetlands, high lifecycle and total life costs, lack of 24-hour access
Alt G3 Downtown to south of airport Ferry	LO	High lifecycle and total life costs, lack of 24-hour access, highest private property impacts of ferry alternatives
Alt G4 New ferry adjacent to existing ferry service	LO	High lifecycle and total life costs, lack of 24-hour access
Alt G4-v Existing ferry with improved shoreside amenities	LO	High lifecycle and total life costs, lack of 24-hour access

In our October 23, 2003, comments on the previous Draft EIS, we recommended that the Final EIS clearly demonstrate the advantages of the 24-hour, hard-link alternatives (bridges) over the ferry alternatives. We recognized that the Final EIS accomplished this, and we believe this information was appropriately carried over into the Draft SEIS. We again reiterate, however, that the ferry alternatives, and in particular alternatives G3, G4, and G4-v, are able to meet the project's primary purpose of improving surface transportation between Revillagigedo Island and Gravina Island but with less overall environmental impacts, especially to aquatic resources in comparison to the other alternatives.

Based on our review of the information currently presented in the Draft SEIS, we have identified Alternative G4-v as the environmentally preferable action alternative from our perspective. Of the bridge alternatives, although we have given the same rating to both, Alternative C3-4 appears to have fewer environmental impacts than Alternative F3, and may therefore be environmentally preferable although C3-4 does have greater transportation and safety issues. We also note that access to Pennock Island (Alternative F3) is not stated as part of the project's purpose and need.

Our primary recommendation is that the Final SEIS include a draft 404(b)(1) analysis, supported by a wetland functional assessment and draft mitigation plan, to ensure that identification of the least damaging practicable alternative is included in the Final SEIS, and is available to inform the Record of Decision (ROD). We recognize that the Draft SEIS does state that a draft 404(b)(1) analysis will be developed for the Final SEIS. We also recommend that this information be used to modify any alternative as necessary to fully develop the LEDPA. We believe this information is particularly important since only LEDPA can be permitted by the U.S. Army Corps of Engineers. The absence of this information could lead to additional NEPA analysis if the LEDPA is not selected in the ROD.

Again, we appreciate the opportunity to offer comments on the Draft SEIS and look forward to continuing to work with the ADOT and FHWA on addressing the issues we have identified in the Final SEIS. Please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov , or you may contact Jennifer Curtis of my staff in Anchorage at (907) 271-6324 or curtis.jennifer@epa.gov, with any questions you have regarding our comments.

Sincerely,



Christine B. Reichgott, Manager
Environmental Review and Sediments Management Unit

Enclosure

**U.S. Environmental Protection Agency Rating System for
Draft Environmental Impact Statements
Definitions and Follow-Up Action***

Environmental Impact of the Action

LO – Lack of Objections

The U.S. Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC – Environmental Concerns

EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

EO – Environmental Objections

EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU – Environmentally Unsatisfactory

EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

Adequacy of the Impact Statement

Category 1 – Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2 – Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

Category 3 – Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.